EPA Jacket 87931-12

PROCESSING REQUEST

Reg # 87931-12 **Decision # 490198**

Description: New product registration – 100% repack

Material Available Electronically (see PPLS):

✓ Electronic Label/Letter Dated 9/3/14

☐ Other:

Material Sent (see jacket):

☐ Stamped Label/Letter Dated

☐ Notification Dated

✓ New CSF(s) Dated 4/18/2014

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Jacquelyn Marchese

Division: RD

Phone: 703-347-0559 **Date: 9/3/2014**

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7505C)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

NOTICE OF PESTICIDE:
_X_ Registration
___ Reregistration
(under FIFRA, as amended)

EPA Reg. Number:	Date of Issuance:
87931-12	09/03/2014

Term of Issuance:
Conditional

Name of Pesticide Product:
Diflubenzuron Technical

Name and Address of Registrant (include ZIP Code):

Raymat Materials, Inc.
440 Boulder Court, Suite 300
Pleasanton, CA 94566

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Meredith F. Laws, Chief
Insecticide-Rodenticide Branch
Registration Division

Date:

09/03/2014

EPA Form 8570-6

You are required to comply with the DCI identified below:

a. Diflubenzuron GDCI-108201-1286, issued on 06/07/2013

You must comply with all of the data requirements within the deadlines established by the order. If you have questions about the Generic DCI listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division: http://www.epa.gov/oppsrrd1/contacts_prd.htm

2. Make the following label changes before you release the product for shipment:

   - Revise the EPA Registration Number to read, "EPA Reg. No. 87931-12."

3. Submit one copy of the final printed label for the record before you release the product for shipment.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 04/18/2014

If you have any questions, please contact Jacquelyn Marchese at (703) 347-0559 or marchese.jacquelyn@epa.gov.

Meredith F. Laws, Chief
Insecticide-Rodenticide Branch
Registration Division (7505P)

[Enclosure]

ACCEPTED
09/03/2014
Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under
EPA Reg. No. 87931-12

DIFLUBENZURON TECHNICAL

ACTIVE INGREDIENT:
Diflubenzuron (CAS# 35367-38-5) 97.46%
OTHER INGREDIENTS 2.54%
TOTAL 100.00%

EPA Reg No. 87931-? EPA Est. No. XXXXX-XXX-XX

KEEP OUT OF REACH OF CHILDREN

CAUTION

Raymat Materials Inc.
440 Boulder Court, Suite 300, Pleasanton, CA 94566

Net Contents: 55 Lbs (25 Kg)

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed or absorbed through skin. Harmful if inhaled. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Avoid breathing spray mist. Wear long sleeved shirt and long pants, shoes, socks and chemical resistant gloves (such as or made of any waterproof matrial, selection category A.)

FIRST AID

Call a poison control center or doctor immediately for treatment advice.

If swallowed:	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If on skin or clothing:	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
If inhaled:	Move person to fresh air If person is not breathing call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
If in eyes	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center, doctor, or going for treatment. You may also call the National Pesticide Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30am to 4:30pm PST (NPIC Web site: www.npic.orst.edu) for medical treatment information.

USER SAFETY RECOMMENDATIONS

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to aquatic invertebrates. Do not contaminate water when disposing of equipment washwater. Do not discharge effluent containing this product into any body of water unless the product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without first notifying the sewage treatment plant authority. For guidance contact your Static Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This pesticide is for manufacturing use only. It is only to be used for the formulation into insect growth regulator products for the following use (a) livestock and their premises, for fly control; (b) artichokes, barley, oats, triticale, wheat, citrus, cotton, grassland, leafy brassica and turnip greens, mushrooms, peanuts, pears, peppers, rice, soybeans, stone fruit (excluding cherries), treenuts, turfgrass; (c) non-food uses: ornamentals, forestry, products for parasite control in ornamental fish ponds, aquatic non-crop sites e.g. products for mosquito/midge control and (d) uses for experimental purposes that are in compliance with U.S. EPA requirements.

PESTICIDE STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in original container in a secure, dry storage area

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into mixing equipment. Dispose of empty bag in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

WARRANTY

Raymat Materials Inc., warrants that this product conforms to the chemical description on the label. Raymat Materials Inc., neither makes nor authorizes any agent or representative to make any other warranty of fitness of merchantability, guarantee or representation, express or implied, concerning this product. To the extent consistent with applicable law, Raymat Materials Inc.'s maximum liability for breach of this warranty shall not exceed that purchase price of this product. To the extent consistent with applicable law, buyer and user acknowledge and assume all risks and liabilities resulting from the handling, storage and use of this product which extend beyond the use of this product under normal conditions in accord with the statements on this label.

Batch code.

Please read instructions on reverse before completing form. Form Approved OMB No. 2070-0060

Print Form

United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number: 87391-? 87931-

2. EPA Product Manager: Venus Eagle

3. Proposed Classification: ☒ None ☐ Restricted

4. Company/Product (Name): Raymat Materials Inc./DIFLUBENZURON TECHNICAL

PM# 1

5. Name and Address of Applicant *(Include ZIP Code)*
Raymat Materials Inc.
440 Boulder Court, Suite 300
Pleasanton, CA 94566
☐ *Check if this is a new address*

6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. [redacted]
Product Name [redacted]

Section - II

☐ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in response to Agency letter dated _____
☐ "Me Too" Application.
☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
PRIA Category R300
Pay.gov Tracking ID: 25FB5D7Q
Agency Tracking ID: 74603214075

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes* ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Metal ☒ Plastic ☐ Glass ☒ Paper ☐ Other (Specify) _____
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information: ☒ Label ☐ Container

4. Size(s) Retail Container: 55 lb (25 Kg)

5. Location of Label Directions: ☒ On Label ☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product: ☒ Lithograph ☐ Paper glued ☐ Stenciled ☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
IAIN WEATHERSTON	Consultant to Raymat Materials Inc.	623-535-4055

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature: Iain Weatherston

3. Title: Consultant to Raymat Materials Inc.

4. Typed Name: IAIN WEATHERSTON

5. Date: April 18, 2014

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

Product ingredient source information may be entitled to confidential treatment

J&T Associates LLC

4061 North 156th Drive, Goodyear, AZ 85395

Iain Weatherston, Ph.D.
Director
623-535-4055/623-317-9013
E-mail: iweatherston@cox.net

Venus Eagle, Product Manager (1)
U.S. EPA – OPP [7505-P]
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

April 18, 2014

SUBJECT:	Application to Register Diflubenzuron Technical
COMPANY:	Raymat Materials Inc. 440 Boulder Court, Suite 300 Plesanton, CA 94566
CONTACT:	Iain Weatherston, Ph.D, J&T Associates LLC [contact information as per letterhead]
PRIA CATEGORY:	R300
PRODUCT:	Diflubenzuron Technical [EPA File Symbol 87931-?]

Dear Ms. Eagle:

As agent for, and on behalf of Raymat Materials Inc., I submit for your review and approval an application to register Diflubenzuron Technical, a 100% repackage of a currently registered product. Raymat Materials Inc. claims that their product is identical in composition and labeling to [redacted] with EPA Registration Number [redacted]. No data are required to be submitted for identical products.

In addition to this letter, the Administrative Volume [Volume 87931-?-1] of this application contains:

- A fully executed application for pesticide registration [8570-1]
- A fully executed formulator's exemption [8570-27]
- Draft label (1 copy bound into the volume and one copy on CD-ROM)
- Confidential Statement of Formula [8570-4]

Should you have any questions or further information is required, please do not hesitate to contact me.

Sincerely,

Iain Weatherston
Agent for Raymat Materials Inc.

TRANSMITTAL DOCUMENT

NAME & ADDRESS OF APPLICANT

Raymat Materials Inc.
440 Boulder Court, Suite 300
Pleasanton, CA 94566

REGULATORY ACTION IN SUPPORT OF WHICH THIS PACKAGE IS SUBMITTED

APPLICATION TO REGISTER DIFLUBENZURON TECHNICAL
A MANUFACTURING USE PRODUCT
A 100% RE-PACK REGISTRATION

TRANSMITTAL DATE

April 18, 2014

LIST OF SUBMITTED MATERIAL

VOLUME 87931-?-1 Administrative Volume: Correspondence, Application, Forms, Label and Confidential Statement of Formula

PRIA INFORMATION

PRIA Category R300
Pay.gov Tracking ID 25FB5D7Q
Agency Tracking ID 74603214075

COMPANY AGENT/CONTACT

Iain Weatherston, Ph.D.
J&T Associates, LLC
4061 North 156th Drive
Goodyear, AZ 85395
623-535-4055 / iweatherston@cox.net

AGENT SIGNATURE Iain Weatherston **DATE** 4-18-2014

Form approved. OMB No. 2070-0060, 2070-0107, 2070-0122, 2070-0164.

Product ingredient source information may be entitled to confidential treatment

EPA

United States
Environmental Protection Agency
Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address	EPA File Symbol/Registration Number
Raymat Materials Inc. 440 Boulder Court, Suite 300 Pleasanton, CA 94566	87931-? Product Name Diflubenzuron Technical Date of Confidential Statement of Formula *(EPA Form 8570-4)* April 18, 2014

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Diflubenzuron (CAS No. 35367-38-5)

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula *(EPA FORM 8570-4)* for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Diflubenzuron	[redacted]	[redacted]

Signature	Name and Title	Date
Iain Weatherston	Iain Weatherston, Agent	April 18, 2014

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA
Copy 2 - Applicant copy

Marchese, Jacquelyn

From: Marchese, Jacquelyn
Sent: Thursday, July 10, 2014 2:33 PM
To: 'Iain Weatherston'
Subject: RE: 87931-RE - Diflubenzuron Technical Repackage

Iain,

Thanks for the response. I'll let you know if we need anything else.

Jacquelyn

Jacquelyn Marchese
Entomologist
OCSPP/OPP/RD/IRB
Email: Marchese.Jacquelyn@epa.gov
Phone: (703) 347-0559

From: Iain Weatherston [mailto:iweatherston@cox.net]
Sent: Thursday, July 10, 2014 12:40 PM
To: Marchese, Jacquelyn
Subject: Re: 87931-RE - Diflubenzuron Technical Repackage

Jacquelyn:
I apologize for this reply taking so long however I believe my colleague Megha Even did contact you saying that I was out of the country.
Please find attached an updated label as you requested. If there is anything else you need in regard to this repackaging registration please let me know and I'll get back to you right away.
Thanks,
Iain

Iain Weatherston, Ph.D.
J&T Associates LLC
4061 North 156th Drive,
GOODYEAR, AZ 85395
623-535-4055
Iweatherston@cox.net

From: "Marchese, Jacquelyn" <Marchese.Jacquelyn@epa.gov>
Date: Monday, June 23, 2014 at 9:00 AM
To: Iain Weatherston <Iweatherston@cox.net>
Subject: 87931-RE - Diflubenzuron Technical Repackage

Iain,

Please see the recently revised label for [redacted] (EPA Reg No. [redacted], attached. In order for your new product 87931-RE, a repack of [redacted] be processed, its label needs to reflect these recent changes.

For your convenience, these label changes include the revision of the Tox Category IV to a Tox Category III (with accompanying first aid and warning statements), minor changes to the Pesticide Storage & Disposal section, and the inclusion of the batch code.

Please let me know if you have any questions.

Thank you,
Jacquelyn Marchese

Jacquelyn Marchese
Entomologist
OCSPP/OPP/RD/IRB
Email: Marchese.Jacquelyn@epa.gov
Phone: (703) 347-0559

Similarity Clinic Screen Completed

Date: 5/13/14

Jacket #: 87931-R2

Actions Done:

Acute Toxicity Review: COMPLETED - ~~SEE~~ IN JACKET
Acute Toxicity Language for Label: DONE - SEE REVIEW

Product Chemistry Review: 100% REPACK OF [redacted] SEND TO TRB FOR REVIEW

Transfer This Jacket To:

PM 7 REUBEN BARIS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

~~CONTAINS CBI – DO NOT RELEASE TO REGISTRANT~~

SIMILARITY CLINIC MEMORANDUM:

Subject: EPA Reg. No.: 87931-RE/Diflubenzuron Technical
DP Barcode: 420189
PC Code: 108201

From: Marianne Lewis, Biologist
Insecticides/Rodenticides Branch
Registration Division (7505P)

To: Reuben Baris, PM 07
Rodenticide-Insecticide Branch
Registration Division (7505P)

Applicant: Raymat Materials, Inc.
440 Boulder Court, Suite 300
Pleasanton, CA 94566

FORMULATION FROM EPA Reg. No. 87931-RE LABEL:

	% by wt.
Active Ingredient(s):	
Diflubenzuron:	97.46%
Inert Ingredient(s):	2.54%
Total	100.00%

BACKGROUND: The registrant is claiming substantial-similarity to EPA Reg. No. [redacted] to support the registration of their new product, EPA Reg. No. 87931-RE. The subject product is a 100% repack of [redacted]. Based on the acute toxicity profile for EPA Reg. No. [redacted], the following acute toxicity categories will be assigned to the subject product: acute oral (81-1) – III; acute dermal (81-2) – III; acute inhalation (81-3) – III; primary eye irritation (81-4) – III; primary skin irritation (81-5) – III; and will be classified as a non sensitizer (81-6).

There is no acute toxicity data cited/submitted or reviewed in the files for any of the diflubenzuron technicals. There were some very old (1973 & 1984) reviews in IHAD but these studies are more than likely not up to today's standards. So the bottom line is that there is no acute toxicity data supporting the EPA Reg. No. [redacted]. The acute toxicity profile listed out is based on the IHAD reviews. Please note - one of the old studies listed in the IHAD database had the primary eye irritation study as a tox category II.

Recommend that PRD requires a new set of acute toxicity studies be conducted on the technical. Also, recommend that the other technicals have their labels updated by RD to reflect the listed tox categories.

RECOMMENDATIONS:

- The subject product will be assigned the Toxicity Categories listed above to support the registration of EPA Reg. No. 87931-RE.
- The subject product will be classified as a non sensitizer.

The acute toxicity profile for EPA Reg. No. 87931-RE is currently:

Acute Oral	III
Acute Dermal	III
Acute Inhalation	III
Primary Eye	III
Primary Dermal	III
Skin sensitization	non sensitizer

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: 087931-RE DIFLUBENZURON TECHNICAL

SIGNAL WORD: **CAUTION**

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Harmful if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Avoid breathing spray mist. Wear long sleeved shirt and long pants, shoes, socks and chemical resistant gloves (such as or made out of any waterproof material, selection category A).

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

21-Day Screen Completed by Contractor

21-Day Expires on 5-12-14

Jacket # 87931-RE
MRID# _____

Content Screen: Recommend to Pass/Fail

11-3 Review: Pass/Fail/NA

Overall Status: Recommend to Pass/Fail

Transfer This Jacket to:

STEPHEN SCHAIBLE

PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 4-21-14

Experts In-Processing Signature: B.B. Date 4-22-14 Fee Paid: Yes ✓

Division management contacted on issues No _____ Yes _____ Date _____

EPA Reg. Number: 87931-RE	EPA Receipt Date: 4-21-14

	Items for Review			Yes	No	N/A*
1	**Application Form** (EPA Form 8570-1) signed & complete including package type			X		
2	**Confidential Statement of Formula** all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All inerts, including fragrances, approved for the proposed uses (see Footnote A) 100% repack	**yes**	**no**			
3	**Certification with Respect to Citation of Data** (EPA Form 8570-34) completed and signed (N/A if 100% repack)					X
	Certificate and data matrix consistent					
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	**yes**	**no**			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	**Formulator's Exemption Statement** (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
5	**Data Matrix** (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)					X
	a) Selective Method (Fee category experts use)	**yes**	**no**			
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	**5 Copies of Label (Electronic labels on CD are encouraged and guidance is available)**			X		
7	**Is the data package consistent with PR Notice 86-5**					
8	**Notice of Filing included with petitions**					X

9	**If applicable for conventional applications, <u>reduced risk rationale</u>**			X
10	**<u>Required Data</u> and/or data waivers. See Footnote C.**			
	a) List study (or studies) not included with application			

Comments: No studies Pass

100% repack, no inerts to review

TC

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the inert Web site and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient.** Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch.

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or

2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or

3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or

2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or

2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

R 300 and 301

100% identical (repack): YES or NO (circle one)
{If **yes**, it's a 100% repack - then product chemistry, acute toxicity and efficacy data are not required}

Data on Group A and B must be submitted - Group A and B can not be cited.

Guideline No.	Group A: Product Chemistry Data Study Title	Data submitted	
		Yes	No
830.1550	Product Identity & Composition		
830.1600	Description of materials used to produce the product		
830.1650	Description of formulation process		
830.1670	Discussion on the formation of impurities		
830.1700	Preliminary analysis		
830.1750	Certified limits (158.345)		
830.1800	Enforcement analytical method		

Guideline No.	Group B: Product Chemistry Data Study Title	Data submitted	
		Yes	No
830.6302	Color		
830.6303	Physical State		
830.6304	Odor		
830.6314	Oxidation/Reduction (Chemical incompatibility)		
830.6315	Flammability		
830.6316	Explodability		
830.6317	Storage stability		
830.6319	Miscibility		
830.6320	Corrosion Characteristics		
830.6321	Dielectric Breakdown voltage		
830.7000	pH		
830.7100	Viscosity		
830.7300	Density		

R 300 and 301

New products must provide a bridging rationale document. The bridging document directs OPP to use a currently registered set of 6 acute toxicity data and label; instead of submitting product specific data.

Guideline No.	Acute toxicity (6 pack) Study Title	Cited	
		Yes	No
870.1100	Acute Oral (LD50)		
870.1200	Acute Dermal (LD50)		
870.1300	Acute Inhalation (LC50)		
870.2400	Acute Eye Irritation		
870.2500	Acute Dermal Irritation		
870.2600	Dermal Sensitization		

Efficacy - which guideline depends on the proposed label use and they must cite the data to be used for the bridging rationale.

Guideline No.	Efficacy Study Titles	Cited		Comments
		Yes	No	
810.3100	Soil Treatments for Imported Fire Ants			
810.3200	Livestock, Poultry, Fur and Wool-Bearing Animal Treatments			
810.3300	Treatments to Control Pests of Humans and Pets			
810.3400	Mosquito, Black Fly, and Biting Midge (Sand Fly) Treatments			
810.3500	Premises Treatments			
810.3600	Structural Treatments			
810.3800	Methods for Efficacy Testing of Termite Baits			

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 22, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-490198
EPA File Symbol or Registration Number: 87931-RE
Product Name: DIFLUBENZURON TECHNICAL
EPA Receipt Date: 21-Apr-2014
EPA Company Number: 87931
Company Name: RAYMAT MATERIALS INC.

IAIN WEATHERSTON, PH.D.
J&T ASSOCIIATES LLC
RAYMAT MATERIALS INC.
4061 NORTH 156TH DRIVE
GOODYEAR, AZ 85395-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R300
NEW PRODUCT;OR SIMILAR COMBINATION PRODUCT (ALREADY REGISTERED) TO AN IDENTICAL OR SUBSTANTIALLY SIMILAR IN COMPOSITION AND USE TO A REGISTERED PRODUCT;REGISTERED SOURCE OF ACTIVE INGREDIENT;NO DATA REVIEW ON ACUTE TOXICITY, EFFICACY OR CRP - ONLY PRODUCT CHEMISTRY DATA;CITE-ALL DATA CITATION, OR SELECTIVE DATA CITATION WHERE APPLICANT OWNS ALL REQUIRED DATA, OR APPLICANT SUBMITS SPECIFIC AUTHORIZATION LETTER FROM DATA OWNER;CATEGORY ALSO INCLUDES 100% RE-PACKAGE OF REGISTERED END-USE OR MANUFACTURING-USE PRODUCT THAT REQUIRES NO DATA SUBMISSION NOR DATA MATRIX;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,
Teresa Downs
Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service

{950924-~

This package includes the following

- ◉ New Registration
- ○ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ___

for Division

- ○ AD
- ○ BPPD
- ◉ RD

Risk Mgr. 1

Receipt No. S-	950924
EPA File Symbol/Reg. No.	87931-RE
Pin-Punch Date:	4/21/2014

☐ This item is NOT subject to FFS action.

Action Code:

Requested: R300

Granted: R300

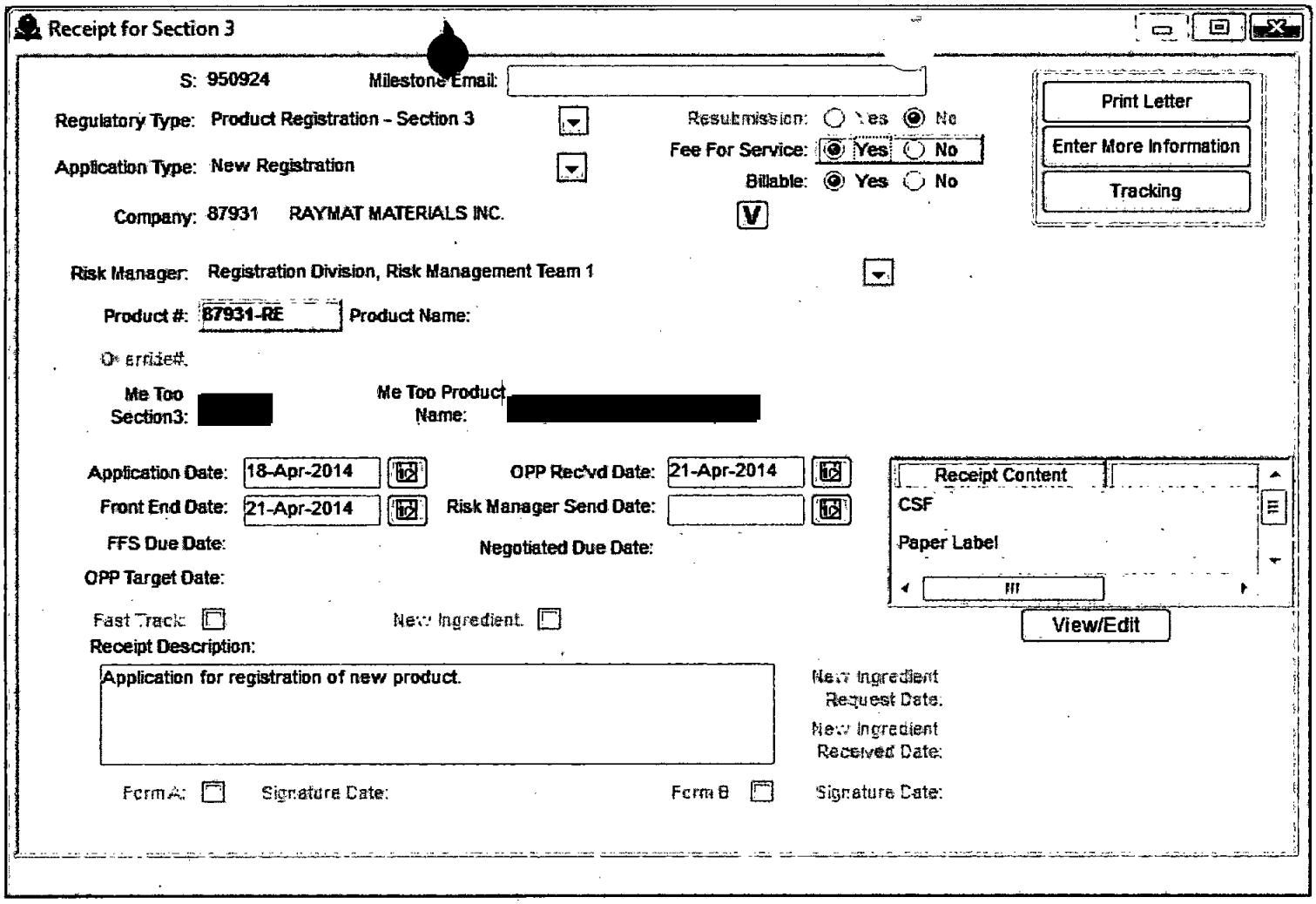
Amount Due: $ 1506

Parent/Child Decisions:

☒ Inert Cleared for Intended Use ☒ Uncleared Inert in Product

Reviewer: Jennifer Gaines Date: 4/22/14

Remarks: 100% Re-pack; Similarity Clinic



Product ingredient source information may be entitled to confidential treatment

Commercial/financial information may be entitled to confidential treatment

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or wish to cancel this payment, please contact Pay.gov Customer Service by phone at (800) 624-1373 or by email at pay.gov.clev@clev.frb.org.

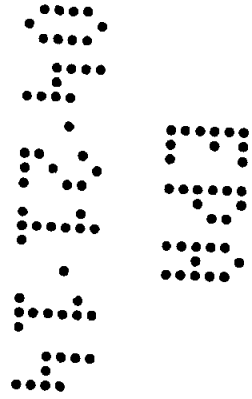
Application Name: PRIA Service Fees
Pay.gov Tracking ID: 25FB5D7Q
Agency Tracking ID: 74603214075

Account Holder Name: J&T ASSOCIATES
Transaction Type: ACH Debit
Transaction Amount: $1,506.00
Payment Date: Apr 18, 2014
Account Type: Business Checking
Routing Number: [redacted]
Account Number: **********6224

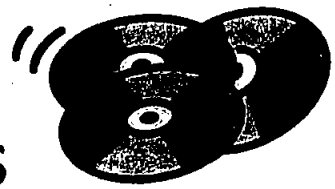
Transaction Date: Apr 17, 2014 7:40:42 PM
Total Payments Scheduled: 1
Frequency: OneTime

Decision Number:
Registration Number: 87931-?
Company Name: RAYMAT MATERIALS INC
Company Number: 87931
Action Code: R300

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



Product ingredient source information may be entitled to confidential treatment



NEW APPLICATIONS

DATE: APR 21 2014

FILE REG NUMBER: 87931-RE

FEP (OPPIN ENTRY) LV APR 21 2014

(Initial & Date)

FILE ROOM: _____

(Initial & Date)

SIG: _____

(Initial & Date)

FILE ROOM: _____

(Initial & Date)

ASSIGN TO PM: AD ✓ **RD** 1 **BPPD** _____

_____ **JACKET TO SHELF (DATA)**

REVISED 11/28/12

pink clinic
100% repack

[redacted]

PLACE HOLDER PAGE

CROSS-REFERENCE NUMBER [1]

The cross-reference number noted on this place holder page is used in place of the following whole page(s)

DELETED PAGE:	Found in the Confidential Attachment
PAGES:	13
REASON FOR THE DELETION:	Confidential Statement of Formula
FIFRA REFERENCE:	§ 10(d)(1)[C]

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FIFRA REFERENCE:	§ 10(d)(1)[C]

CONFIDENTIALITY CLAIMS

STATEMENT OF DATA CONFIDENTIALITY

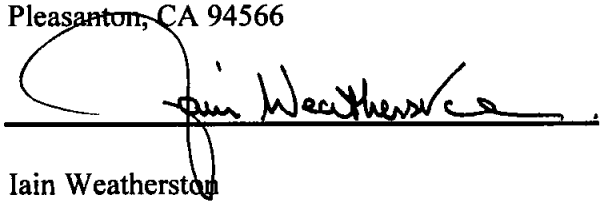
Information claimed confidential on the basis of its falling within the scope of FIFRA § 10(d)(1) (A), (B) or (C) has been removed to a confidential attachment and is cited by cross-reference number in the body of the text.

COMPANY:	Raymat Materials Inc.
COMPANY AGENT:	Iain Weatherston, Ph.D.
TITLE:	Agent to Raymat Materials Inc.
DATE:	April 18, 2014
SIGNATURE:	

VOLUNTARY RELEASE OF INFORMATION TO STATES AND FOREIGN GOVERNMENTS

(40 CFR 158.33(c)(4))

I authorize the Environmental Protection Agency to release any information contained in this document to State and foreign governments, without relinquishing proprietary rights or any confidentiality claims asserted above.

COMPANY:	Raymat Materials Inc. 440 Boulder Court, Suite 300 Pleasanton, CA 94566
SIGNATURE:	
TYPED NAME OF SIGNER:	Iain Weatherston
TITLE OF SIGNER:	Agent to Raymat Materials Inc.
DATE:	April 18, 2014

GOOD LABORATORY PRACTICES STATEMENT

The purpose and scope of this report DO NOT fall under the requirements of 40 CFR 160.

Iain Weatherston

April 18, 2014

Iain Weatherston

Date

For Applicant and Submitter

CONTENTS

Confidential Statement of Formula may be entitled to confidential treatment